



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

SEP 05 2017

RCRA



Mr. Lawrence C. Rosen
Environmental Operations, Inc
1530 South Second Street, Suite 200
St. Louis, Missouri 63104-4500

RE: Comments on the Revised Corrective Measures Study Report dated June 30, 2017, for the former
Solutia - J.F. Queeny Site, St. Louis, Missouri
EPA ID # MOD004954111

Dear Mr. Rosen:

The U.S. Environmental Protection Agency Region 7 and Missouri Department of Natural Resources have completed their review of the subject document and are providing the following comments to be incorporated into a revised CMS Report to be submitted to the agencies within 30 days of the date of this letter.

1. Section 4.3.2 – Plume Stability: The EPA Vapor Intrusion Screening Level calculator is a tool based on a generic conceptual model used for estimating generally recommended, media specific, risk-based screening level concentrations. Unless it is definitively demonstrated that site conditions are the same as the conditions and assumptions of the generic conceptual site model of the VISL calculator, the model should not be used for establishing site-specific action levels. Thus, the column headings of the table should be renamed “Estimated Groundwater Screening Level” and “Estimated Groundwater Action Level”.
2. Section 5.3, Restrictive Covenant and AUL, Page 30: This section discusses the property use restrictions that will be included in the Environmental Covenant for the property. EOI has notified the agencies that portions of the property have been transferred to Faultless Laundry Company and Opus Development Company. EOI may want to consider a separate Environmental Covenant for each parcel.
3. Section 5.4, Groundwater Monitoring Program, Page 32, Second Paragraph: This section states that a detailed analysis of monitored natural attenuation parameters was previously completed as part of the interim measures and injection activities. At that time, it was demonstrated that MNA was occurring. While the previous investigations determined that MNA was occurring, MNA should be included as part of the groundwater monitoring program to verify that MNA processes are still active and continue to reduce groundwater concentrations. A contingency plan should also be developed and implemented should it be determined the MNA processes are no longer active or statistical evaluation determines that the groundwater concentrations are increasing. As part of the corrective measures implementation process, the groundwater monitoring plan should be updated to include MNA parameters as well as monitoring frequency.



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4. The agencies previously commented that a Soil Management Plan be developed as part of the proposed remedy. While we agree that a Soil Management Plan should be prepared as part of the corrective measures implementation process, the CMS should provide an outline for a Soil Management Plan. The Soil Management Plan should include characterization and proper disposal of soil, water, and other materials encountered during construction activities. In addition, the Soil Management Plan should include a general Health and Safety Plan. The Health and Safety Plan should include proper training, safety protocols, and personal protective equipment for construction personnel conducting such work.
5. Section 6.1 – Former FF Building Area: The second sentence of the fourth paragraph should reference the Former FF Building Area, not the former APA.
6. Section 6.3 – Former Bulk Chemical Storage Area: The second sentence of the fourth paragraph should reference the FBCSA and not the former APA.

If you have any questions concerning this matter, please call me at (913) 551-7755.

Sincerely,



Bruce A. Morrison
Project Manager
RCRA Corrective Action and Permits Section
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Christine Kump-Mitchell, MDNR
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